UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

NOV 1 0 2004

Ms. Mary Lou Capichioni
Director
Remediation Services
Corporate Environmental Services
The Sherwin-Williams Company
101 Prospect Avenue, N.W.
Cleveland, OH 44115-1075

Re: Comments on the Sherwin-Williams August 16, 2004, Remedial Investigation Work Plan Implementation Sequence (Implementation Strategy); Gibbsboro, NJ

Dear Ms. Capichioni:

The U.S. Environmental Protection Agency (EPA) has reviewed the August 16, 2004 Remedial Investigation Work Plan Implementation Sequence (Implementation Strategy) submitted by Sherwin-Williams and has the following comments enclosed with this letter. EPA's comments include revised sample locations (enclosed as amended figures) from those proposed by Sherwin Williams, and in some cases (e.g. Hilliards Creek) additional sample locations than proposed in the Implementation Strategy are indicated in order to ensure that adequate data is collected to meet the objectives of the Implementation Strategy.

As indicated in the August 16, 2004 Sherwin Williams correspondence to EPA, the Implementation Strategy will not modify the requirements of the approved RI/FS Work Plan (November 2003 Work Plan).

Please contact Mr. Ray Klimcsak, of my staff, at (212) 637- 3916 if you have any questions or concerns.

Sincerely yours,

Carole Petersen, Chief
New Jersey Remediation Branch

Enclosures

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cc: Allen Danzig, Esq., SWC w/encls.
John Gerulis, SWC w/encls.
Daniel Kopcow, Weston w/encls.
John Doyon, NJDEP w/encls.
Hank Martin, ELM w/encls.
Susanne Peticolas, Gibbons, Del Deo, Dolan, Griffinger, & Vecchione w/encls.
Lynn Arabia, TtFWI w/encls.

Comments on the August, 2004 Remedial Investigation Work Plan Implementation Sequence (Implementation Strategy)

1. Background

a. "COCs" clarification of terminology, page 2 - The term "chemical of concern" (COCs) is used throughout the text (beginning in the Background Section page 2,) within the Implementation Strategy. It should be noted that this term is typically used to identify the chemicals which are risk drivers; that is, those chemicals which are associated with cancer risks in excess of E-06 or non-cancer hazards greater than 1. Since the baseline human health risks assessment has not yet been completed and the COCs have not been identified, the appropriate term for use is "chemical of potential concern"(COPCs). This term is applied to chemicals which exceed some risk-based concentration and therefore require additional evaluation.

2. Overview

a. Page 3 - It is stated that after the initial sequence of sampling (i.e., the full implementation of the CSM), it is the intent of Sherwin-Williams to return to the Dump Site and complete the additional characterization activities within the site and on the adjacent properties. The elements of this characterization and the specific adjacent properties should be specified.

b. Page 3 - It is stated that a limited number of samples will be collected during Phase I of the Implementation Strategy. However, SW has also stated that the remainder of the samples proposed in the approved RI/FS Work Plan, will be collected in the future. It should be pointed out that the terms/conditions for additional sampling (for either full analysis or "refined") or no further sampling have not been provided. If there is a statistical approach for how SW may support their claim to limit the "COPCs" or the collection of samples (as a result of the Phase I sampling event) the details of the program should be identified.

3. Conceptual Site Model (CSM)

a. Conceptual Site Model Page 4 - An example for how the CSM may work is provided. It is stated that sampling may initially occur at the Route 561 Dump Site, to better define what is present in White Sands Branch (ultimately obtaining a list of potential "COPCs"). Afterwards, based on the results of samples collected from within the Dump Site, a limited sampling event would occur in the White Sands Branch (WSB) area to validate the CSM. It is worth mentioning that the rationale for potentially limiting the analysis of constituents is only applicable for the example discussed above. It may be possible that the constituents present within the Dump Site may be

the only constituents present within WSB. However, as WSB enters the Burn Site, a whole new list of constituents may be present and can no longer be limited to what was found at the Dump Site. Sherwin-Williams has briefly alluded to this fact on Figure 1, here it is stated that "some" sites/areas (i.e., all of the remaining) require a separate conceptual model diagram. This may be attributed to the fact that all of the remaining sites/areas have the very high likelihood of "containing/ possessing" their own list (source of) constituents; and therefore, samples collected should not be analyzed for constituents in a "limited" sense. Finally, it is important to note that due to off-site migration through run-off or groundwater migration, particular constituents on the Dump site may not be present within WSB.

b Conceptual Site Model Figure 1 - The rationale for why "reservoir outfall" is depicted as a mode of transportation which may occur at Silver Lake and Clement Lake, but not Bridgewood Lake and Kirkwood Lake, must be presented.

Additionally, the rationale for why Bridgewood and Kirkwood Lake are believed to be "sinks" and that no movement of COPCs will occur should be explained in further detail. The depths within Bridgewood Lake do not exempt them from the fact that heavy rains could cause the transfer of both water and sediment from the lakes to other areas. In addition, it should be pointed out that previous sampling has shown lead concentrations - over 400 ppm in the stream from Bridgewood Lake's outfall point (on W. Clementon Rd.) to where it meets up with Hilliard Creek.

c. Conceptual Site Model Figure 1 The rationale for why groundwater is not depicted on the CSM as a mode of constituent migration/transfer from Hilliard Creek (headwaters and downstream) to both the Braided Stream and Kirkwood Lake, must be provided.

d. Conceptual Site Model Figure 1 According to the CSM it appears that the following modes of constituent transfer/migration may or may not occur within Bridgewood Lake:

i. Groundwater may potentially transfer constituents from Bridgewood Lake to Hilliard Creek.

ii. Groundwater does not potentially transfer constituents from Bridgewood Lake to the Braided Stream.

iii. Reservoir outfall (including sediment) does not potentially transfer constituents from Bridgewood Lake to the Braided Stream, nor eventually Hilliard Creek.

As mentioned earlier, the rationale for why it is stated that reservoir outfall ("lake" water and sediments) is not a mode of transport for constituents, generating from Bridgewood Lake, must be provided. In addition, the rationale for why groundwater is not shown as a mode of transport of constituents to the Braided Stream must be provided.

e. Conceptual Site Model Figure 1 - Similar interpretation of the CSM depiction of Kirkwood Lake requires the following clarification. The rationale for why groundwater and reservoir runoff (both "lake" water and sediments) are not depicted as potential modes of constituent migration, originating from Kirkwood Lake, must be provided.

f. Conceptual Site Model Figure 1 - In the CSM Legend a "dashed" arrow is used to indicate "Direction of Water Flow During Major Storms"; however, it is difficult to discern whether or not this symbol is depicted on the map. It should be noted that this is an important mode of constituent transfer which may occur, potentially causing both lake water and sediments to be subject to fate transport, and should be factored into the CSM.

4. Residential Sampling

There was no discussion for the inclusion of residential sampling during Phase I of the Implementation Strategy. Residential sampling should be conducted during Phase I activities in accordance with the language of the approved RI/FS Work Plan in its entirety. soil? GW?

5. Background Samples

a. It is stated within the CSM that Silver Lake, Clement Lake, and Haney run are "background". An explanation of the term background as it is used here should be provided. In addition, it should be noted that there has been no formal discussion for the collection of background samples. It should be clarified whether or not it is intended to do so.

b. The rationale for why Haney (Honey) Run is indicated as "background"on the CSM should be presented. This statement is contradicted by language on page 3 of the Implementation Plan, where it is stated that Haney Run (along with Hilliard Creek and WSB) represent both transport pathways and receptors for COPCs that are present in the source areas.

6. Proposed Sample Locations

a. Figures of the intended areas to be sampled with depictions of proposed sampling locations, have been provided by Sherwin-Williams as part of the Implementation Strategy. Utilizing previously collected data (i.e., Sherwin-Williams and their contractors, the NJDEP, and the EPA and their contractors)

the EPA has reviewed and considered the proposed sampling locations and now offers their concurrence, or recommendations (see enclosed figures).

b. The following figures, which depict areas as well as sampling locations selected by Sherwin-Williams, are approved by EPA as submitted with the Implementation Strategy: Haney Run Brook (Figure 5-3); White Sands Branch (Figure 5-4); Bridgewood Lake (Figure 5-5); and Vacant Lot (Figure 5-8).

c. The following figures: United States Avenue Burn Site (Figure 5-1); Route 561 Dump Site (Figure 5-2); and the Railroad Site (Figure 5-9) have been submitted with sample locations recommended by the EPA. Note, due to the fact that EPA did not have an electronic copy of Sherwin-Williams Implementation Strategy, we used maps which were taken from the approved RI/FS Workplan. As a result, sample locations previously recommended by Sherwin-Williams are not depicted in manner in which they were on the Implementation Strategy figures.

EPA has used the following color scheme for figures 5-1, 5-2, and 5-9 to translate our comments on the strategic sampling locations submitted by Sherwin-Williams:

Red = sample locations agreed upon by both EPA and Sherwin-Williams

Blue = sample locations recommended by EPA

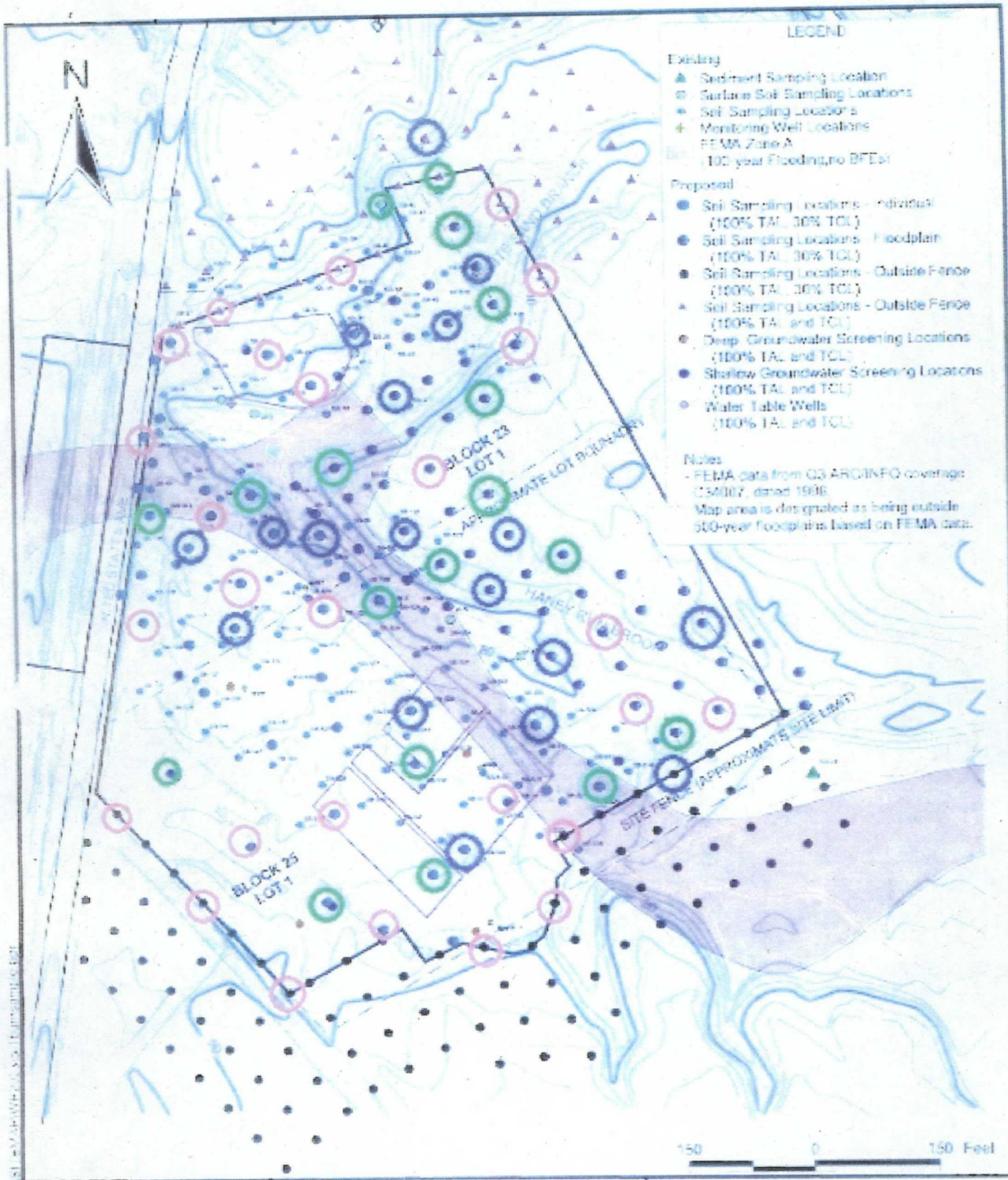
Green = sample locations recommended by Sherwin-Williams

Note: only at the Railroad Site has EPA recommended an increase in the total number of samples previously suggested by Sherwin-Williams. The initial total suggested by Sherwin-Williams was 14, EPA is proposing 17.

d. Having reviewed Sherwin-Williams's proposal for the sampling of Hilliard Creek (Figure 5-9), EPA recommends that the sampling of Hilliard Creek be performed in accordance to the approved RI/FS Workplan (i.e., every 200 ft.)

7. Project Schedule

After the EPA and Sherwin-Williams have agreed on an approach to implement the Implementation Strategy, it will be required that Section 6.0 and Figure 6-1 (of the approved RI/FS Work Plan) be amended. This is due to the fact that the original sampling and analysis approach did not suggest that the work would be conducted in Phases, thereby reducing the number of samples collected during Phase I.



WESTON SOLUTIONS

RI/FS WORK PLAN

GIBBSBORO NEW JERSEY

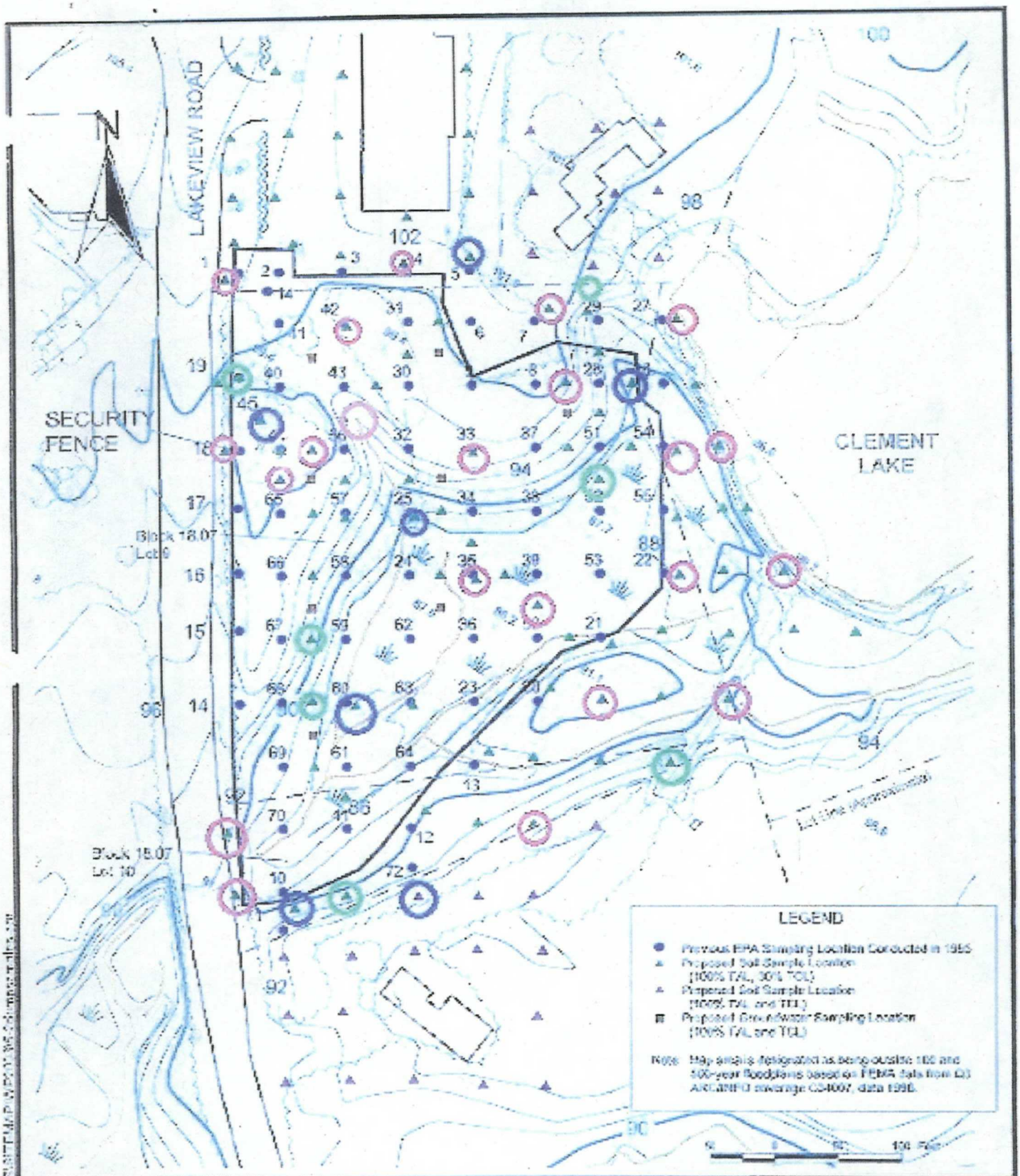
CLIENT NAME:

THE SHERWIN-WILLIAMS COMPANY

UNITED STATES AVENUE
BURN SITE
SAMPLING LOCATIONS

DATE: 11/14/2003

FIGURE #: 5-1



WESTON SOLUTIONS

RI/FS WORK PLAN

GIBBSBORO, NEW JERSEY

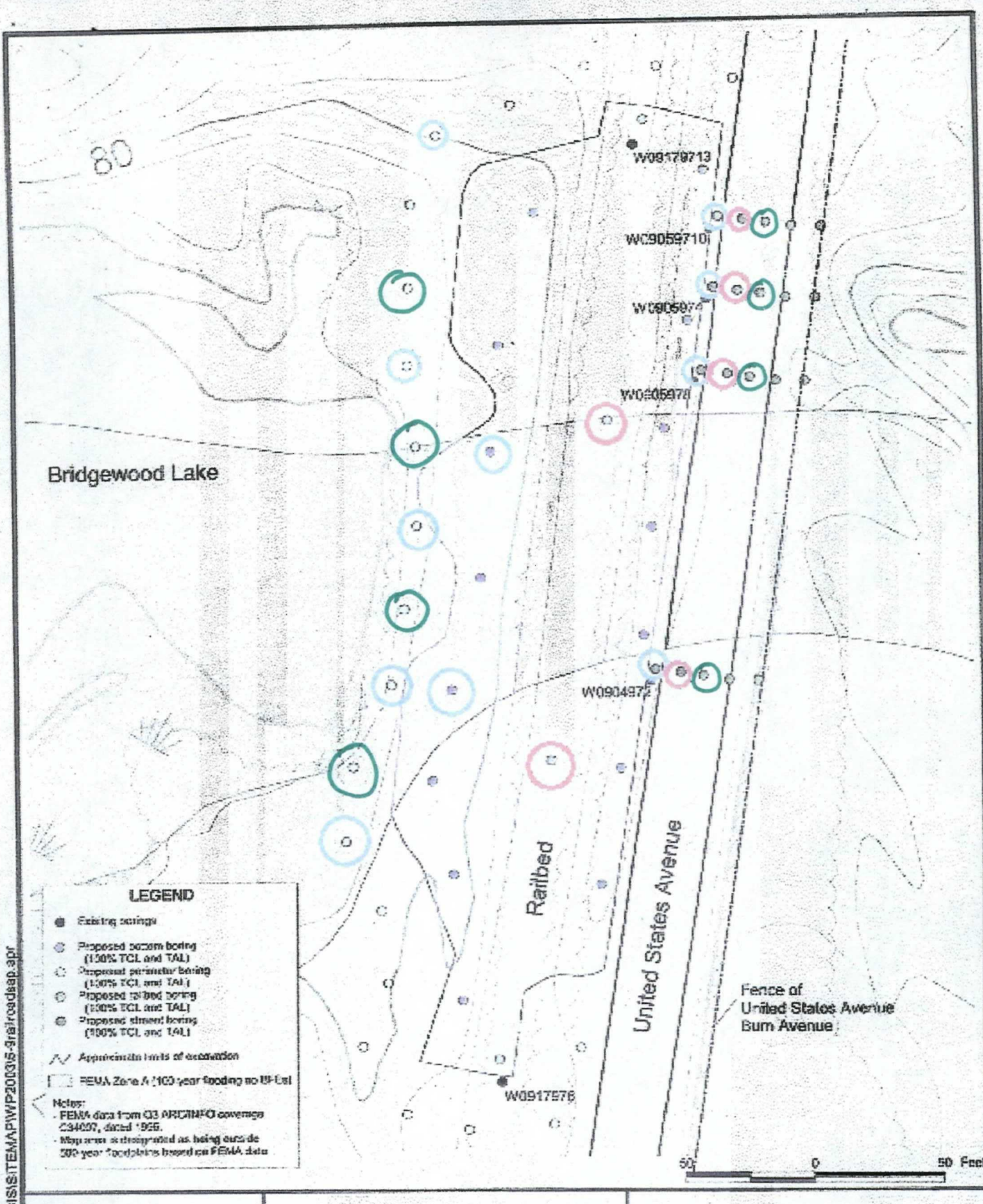
CLIENT NAME:

THE SHERWIN-WILLIAMS COMPANY

ROUTE 561 DUMP SITE
SAMPLING LOCATIONS

DATE: 7/31/2003

FIGURE #: 5-2



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WESTON SOLUTIONS

RI/FS WORK PLAN

GIBBSBORO, NEW JERSEY

CLIENT NAME:

THE SHERWIN-WILLIAMS COMPANY

RAILROAD SITE
SAMPLING LOCATION MAP

DATE: 11/14/2003

FIGURE #: 5-9